

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

HEAVEN WHITE, *et al.*,

*

Plaintiffs,

*

*

Civil Action No.: 1:19-cv-01442-CCB

v.

*

THE CITY OF ANNAPOLIS,
et al.,

*

*

Defendants.

*

* * * * *

JOINT MOTION TO APPROVE AND ENTER CONSENT DECREE

Plaintiffs¹ and the City of Annapolis, one of the remaining Defendants, by and through their respective undersigned counsel, jointly move the Court to approve and enter the proposed Consent Decree, a redacted copy of which is attached hereto and incorporated herein as **Exhibit A**, resolving Plaintiffs' claims against the City of Annapolis in the above-captioned matter. An unredacted copy, **Exhibit B**, which is incorporated herein by reference, will be filed separately and contemporaneously with a joint motion to seal.

WHEREFORE, Plaintiffs and the City of Annapolis respectfully request that the Court approve and enter the Consent Decree and grant any such other relief as the cause may demand.

¹ "Plaintiffs" refer to those individuals identified as Plaintiffs in the operative Complaint, *i.e.*, Heaven White, D'Andre Covert, D.C., H.C., K.C., Tameka Wright, D.W., D.W., D.W., D.W., D.W., D.W., D.W., D.W., Janay Young, Q.B., Z.B., Glenn Rogers, Lakeedrah Johnson, P.J., LaDawn Camp, A.R., Tiamoni Johns, N.J., Z.G., Nashell Smith, D.E.P, D.X.P., M.P., Lakisha McGowan, M.C., M.C., C.R., K.R., K.R., Nicole Clark, T.L., N.C., Tyneice Holliday, D.R., A.H., E.D., Breonna Dixon, Jonathan Dixon, A.D., A.D., Lakisha Fuller, M.D., O.D., A.N., Rynika Simms, and A.S.

Respectfully submitted,

Karpinski, Cornbrooks & Karp, P.A.

By: /s/
E.I. Cornbrooks, IV, #28296

By: /s/
Michael B. Rynd, #28765
120 E. Baltimore Street
Suite 1850
Baltimore, Maryland 21202
410-727-5000
scornbrooks@bkcklaw.com
mrynd@bkcklaw.com
Counsel for the City of Annapolis

By: /s/ P. Joseph Donahue
P. Joseph Donahue, Esquire
The Donahue Law Firm
Bar Number: 06245
18 West Street
Annapolis, Maryland 21401
Telephone: 410-280-2023
Fax: 410-280-0905
pid@wisedonahue.com

By: /s/ Lisa M. Sarro
Lisa M. Sarro
The Donahue Law Firm
Bar Number: 14803
18 West Street
Annapolis, Maryland 21401
Telephone: 410-280-2023
Fax: 410-280-0905
lmsarro@thedonahuelawfirm.com

By: /s/ Kathleen M. Hughes
Kathleen M. Hughes
Maryland Legal Aid
Anne Arundel County Office
Bar Number: 14892
khughes@mdlab.org

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of December, 2020, a copy of the foregoing was electronically filed, with notice to:

Carrie Blackburn Riley, Esquire
Blackburn Riley, LLC
222 Courthouse Ct.
Baltimore, Maryland 21204
cbr@blackburnriley.com
*Attorneys for Housing Authority of
The City of Annapolis*

/s/ E. I. Cornbrooks, IV
Counsel for the City of Annapolis